

ALONSO & NAVARRETE L.L.C.

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Attorneys for Plaintiff KARLA LICONA-PINEDA

KARLA LICONA-PINEDA,

Plaintiff,

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: HUDSON COUNTY
DOCKET NO.: HUD-L-

Civil Action

vs.

COMPLAINT AND JURY DEMAND

VOLODIMIR I. SELIVANOV,
WORLD CLASS TRANSPORTATION LLC,
RESELING RESOLUTIONS INS.,
JOHN DOES #-10, fictitious names, and
XYZ CORPS #1-10, fictitious entities,

Defendants.

Plaintiff, KARLA LICONA-PINEDA, residing at 19 Hancock Dr., W. Milford, County
of Passaic, and State of New Jersey, says:

FIRST COUNT

1. On or about September 15, 2016, at approximately 9:37 a.m., plaintiff KARLA LICONA-PINEDA, was operating her own motor vehicle, which vehicle was at a full and complete stop facing southbound on S. Van Brunt Street in front of #366 S. Van Brunt Street in Englewood, County of Bergen, and State of New Jersey.

2. At same time and place aforesaid, defendant VOLODIMIR I. SELIVANOV was operating a freight truck, owned by defendant WORLD CLASS TRANSPORTATION LLC, which vehicle was at a stop in front of the plaintiff's vehicle aforesaid facing southbound on S. Van Brunt Street and began reversing in front of #366 S. Van Brunt Street in Englewood, County of Bergen, and State of New Jersey.

3. At the time and place aforesaid, the defendant VOLODIMIR I. SELIVANOV so carelessly, recklessly, and negligently operated the motor vehicle owned by defendant WORLD CLASS TRANSPORTATION LLC by failing to make proper and reasonable observations of surrounding traffic and traffic signals suddenly and without warning began to reverse in the opposite direction of traffic thereby colliding his freight truck into the front of the motor vehicle operated by Plaintiff directly behind stopped in traffic as above alleged.

4. As a proximate result of the negligent acts of the defendant VOLODIMIR I. SELIVANOV, plaintiff, KARLA LICONA-PINEDA, was caused to sustain serious and permanent bodily injuries, has suffered and will suffer great pain, shock and mental anguish, was and still is incapacitated and will permanently be disabled, has been and in the future will be obliged to expend and incur large sums of money for medical services, care, medication and treatment, and is unable to attend to her usual duties.

WHEREFORE, plaintiff, KARLA LICONA-PINEDA demands judgment against defendant VOLODIMIR I. SELIVANOV, for damages plus interest and costs of suit.

SECOND COUNT

1. Plaintiff, KARLA LICONA-PINEDA, repeats and re-allege all the allegations of the First Count of the Complaint as set forth herein at length.

2. At the time and place aforementioned, defendant, WORLD CLASS TRANSPORTATION LLC, was the owner and insured of the motor vehicle operated by defendant VOLODIMIR I. SELIVANOV, who was driving said motor vehicle as the agent or employee, for the benefit, with the knowledge and within the scope of the agency, employment and consent.

WHEREFORE, plaintiff, KARLA LICONA-PINEDA, demands judgment against the defendant WORLD CLASS TRANSPORTATION LLC for damages plus interest and cost of suit.

THIRD COUNT

1. Plaintiff, KARLA LICONA-PINEDA, repeats and re-alleges all the allegations of the First Count of the Complaint as set forth herein at length.

2. At the time of the aforementioned accident, plaintiff KARLA LICONA-PINEDA was insured under an auto insurance policy with defendant RESELING RESOLUTIONS INS., which policy had Personal Injury Protection benefits that plaintiff KARLA LICONA-PINEDA is eligible to receive.

3. Plaintiff, KARLA LICONA-PINEDA sustained injuries, which required extensive medical treatment and has incurred extensive medical bills.

4. Defendant RESELING RESOLUTIONS INS. has refused to pay all medical and hospital bills of the plaintiff.

WHEREFORE, plaintiff KARLA LICONA-PINEDA demands judgment against the defendant RESELING RESOLUTIONS INS. as follows:

- (a) Directing the insurance company to pay all outstanding medical bills and any future bills that might be incurred.

FOURTH COUNT

1. Plaintiff, KARLA LICONA-PINEDA, repeats and re-alleges all the allegations of the First, Second, and Third Counts of the Complaint as set forth herein at length.

2. The fictitiously named defendants, JOHN DOES #1-10, fictitious names, are impleaded herein to represent any other entity not actually named in this Complaint who is also responsible for the causation of the injuries sustained herein.

WHEREFORE, plaintiff KARLA LICONA-PINEDA, demands judgment against all the defendants for damages plus interest and cost of suit.

FIFTH COUNT

1. Plaintiff, KARLA LICONA-PINEDA, repeats and re-alleges all the allegations of the First, Second, Third, and Fourth Counts of the Complaint as set forth herein at length.

2. The fictitiously named defendants XYZ CORPS #1-10, fictitious entities, are impleaded herein to represent any other entity not actually named in this Complaint who is also responsible for the causation of the injuries sustained herein.

WHEREFORE, plaintiff KARLA LICONA-PINEDA, demands judgment against all the defendants for damages plus interest and cost of suit.

CERTIFICATION PURSUANT TO R. 4:5-1

I hereby certify that the matter in controversy is not the subject of any other action pending in any court and is likewise not the subject of any pending arbitration proceeding. I further certify that I have no knowledge of any contemplated action or arbitration proceeding which is contemplated regarding the subject matter of this action and that I am not aware of any other parties who should be joined in this action.

JURY DEMAND

Plaintiff demands a trial by a jury on all Counts of the Complaint.

DESIGNATION OF TRIAL ATTORNEY

In accordance with R. 4:24-4, J. Alvaro Alonso, Esq. is hereby designated as trial counsel for the plaintiff(s) in the above matter.

Dated: August 25, 2017

ALONSO & NAVARRETE L.L.C.
Attorneys for the Plaintiff KARLA LICONA-PINEDA

By: /s/ Edgar Navarrete
EDGAR NAVARRETE, ESQ.

Civil Case Information Statement

Case Details: HUDSON | Civil Part Docket# L-003545-17

Case Caption: LICONA-PINEDA KARLA VS SELIVANOV
VOLODIMIR

Case Initiation Date: 08/25/2017

Attorney Name: EDGAR JOSEPH NAVARRETE

Firm Name: ALONSO & NAVARRETE LLC

Address: 6121 KENNEDY BLVD.

NORTH BERGEN NJ 070470000

Phone:

Name of Party: PLAINTIFF : Licona-Pineda, Karla

Name of Defendant's Primary Insurance Company

(if known): Whilesire Insurance

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (VERBAL
THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Hurricane Sandy related? NO

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

08/25/2017
Dated

/s/ EDGAR JOSEPH NAVARRETE
Signed